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February 19, 2001

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Hon. Philip N. Asprodites
Commissioner of Conservation
Office of Conservation
P. O. Box 94275
Baton Rouge, LA 70804-4275

Re: Camerina Zone, Reservoir C
Upper Miogyp Sand, Reservoir B
Gueydan Field
Acadia and Vermilion Parishes, Louisiana

Dear Commissioner Asprodites:

Application is hereby made on behalf of **DAVIS PETROLEUM CORPORATION** for the calling of public hearings, after legal notice, to consider evidence relative to the issuance of orders pertaining to the following matters relating to the Camerina Zone, Reservoir C, and the Upper Miogyp Sand, Reservoir B, all in the Gueydan Field, Acadia and Vermilion Parishes, Louisiana:

1. To establish rules and regulations and to create a single drilling and production unit for the exploration for and production of gas and condensate from the Camerina Zone, Reservoir C, and the Upper Miogyp Sand, Reservoir B, all in the Gueydan Field, Acadia and Vermilion Parishes, Louisiana, said units to be designated CAM RC SUA and U MIOGYB RB SUA, all as shown on the plats attached hereto and made a part hereof.
2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within each of the proposed units with each tract sharing in unit production on a surface acreage basis of participation.
3. To designate Davis Petroleum Corporation as operator of each of the proposed units.

4. To designate the Davis Petroleum Corporation – McBride No. 1 Well as unit well for the proposed CAM RC SUA and the proposed U MIOGYP RB SUA.

5. To provide that any future wells drilled to the Camerina Zone, Reservoir C, and the Upper Miogyp Sand, Reservoir B, all in the Gueydan Field, should be located in accordance with the spacing provisions of Statewide Order No. 29-E.

6. To provide that the Commissioner of Conservation should be authorized to reclassify each of the sands and reservoirs by supplemental order without the necessity of a public hearing if the producing characteristics of each reservoir changes and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation.

7. To consider such others matters as may be pertinent.

The Camerina Zone, Reservoir C, in the Gueydan Field, is hereby defined as being that gas and condensate bearing zone encountered between the depths of 13,782 feet and 14,236 feet (electrical log measurements) in the Hamilton Bros. (formerly McCormick Operating) – Nunez Lyons Estate No. 1 Well, located in Section 37, Township 11 South, Range 1 West, Acadia Parish, Louisiana.

The Upper Miogypsinoides Sand, in the Gueydan Field, Acadia and Vermilion Parishes, Louisiana, was previously defined in Office of Conservation Order No. 440-H, effective January 26, 1999.

Pertinent data, including well logs, may be obtained **AT THE COST OF THE REQUESTING PARTY** from Mr. David Comeaux at Leon Comeaux & Associates, Post Office Box 53922, Lafayette, LA 70505, Telephone Number (337)233-9839.

Pursuant to the Rules of Procedure, a pre-application conference was held on February 16, 2001, in Lafayette, Louisiana, at which the parties named on the attached list were in attendance. The conference was opened by Messrs. Richard W. Revels, Jr. and David Comeaux who explained the bases for the applicant's proposed units. Mr. Bill Dale, representing the Floyd Richard Family, presented a counterplan for the Upper Miogyp Sand. He suggested that a strip of land approximately 380 feet in width be added along the southeast side of the unit, to more nearly center the proposed unit well, thereby increasing the unit to about 615 acres. Several questions were asked and answered. No counterplans were presented regarding the Camerina Zone, Reservoir C, and the conference was then adjourned.

After further consideration of the only counterplan presented, Davis has agreed to enlarge the proposed U MIOGYP RB SUA in the manner suggested by the Richard Family. The revised unit is shown on the plat attached hereto and made a part hereof. With respect to the Camerina Zone, Reservoir C, Davis has made no changes to its original unit proposal, but nevertheless, has attached another unit plat to this application for the convenience of all parties.

February 19, 2001

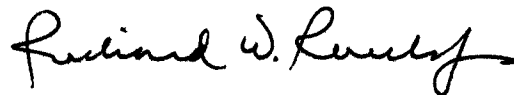
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Also attached hereto and made a part hereof is a list of the names and addresses of the Interested Owners, Represented Parties, and Interested Parties to whom a copy of this application is being mailed. Pursuant to the Revised Rules of Procedure, such list of parties is being furnished only to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation; however, the list of parties will be furnished to any party requesting copies. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, enclosed is our check on behalf of the applicant, in the amount of \$1,400.00, made payable to the Office of Conservation representing the required hearing application fee.

Very truly yours,



Richard W. Revels, Jr.

RWRjr/df
Attachments
67870_1.DOC
17631.0019

cc: Mr. Richard Hudson
Lafayette District Office of Conservation

cc: Interested Owners, Represented Parties
and Interested Parties

